



July 10, 2003

Chip Humphrey
US Environmental Protection Agency, Region 10
811 SW 6th Avenue, 3rd Floor
Portland, OR 97204

Tara Martich
US Environmental Protection Agency, Region 10
1200 Sixth Ave, M/S ECL-115
Seattle, WA 98104

RECEIVED
JUL 14 2003
Environmental Cleanup Office

Re: Lower Willamette River, Portland Harbor Superfund Site
USEPA Docket No: CERCLA-10-2001-0240
Deviation in PCB analysis methods

Dear Mr. Humphrey and Ms. Martich:

The purpose of this letter is to document a deviation from the Round 1 Quality Assurance Project Plan (QAPP) (SEA 2002) related to the analysis of dioxins/furans and PCB congeners for Round 1 biological tissue samples.

Axys Analytical Services (Axys) conducted preliminary method development for dioxin/furans and PCB congeners in February 2003 prior to authorization of the Round 1 LWG sample analyses in March 2003. During the method development activities, Axys extracted 75 grams of tissue, as indicated in the Round 1 QAPP, and attempted analysis of the extracts by high-resolution gas chromatography/mass spectrometry (HRGC/MS). Axys found that the extract from 75 grams of tissue saturated the MS for the tested tissue samples, making quantification infeasible. At that time, the LWG project chemist, Laura Jones, contacted Ginna Grepo-Grove in late February and discussed this issue. Subsequently, during a teleconference with Laura Jones, Ginna Grepo-Grove and both of you on March 4th, a deviation from the QAPP was proposed for tissue analysis for dioxin/furans and PCB congeners. LWG proposed an initial extraction of 20 or 10 grams of tissue, rather than the 75 grams described in the QAPP. During the same call, EPA orally approved this deviation and requested that this process be described in the case narratives for the relevant data packages. Consistent with the QAPP, this process will also be noted in the RI/FS report. In addition, Ginna Grepo-Grove requested that LWG require the laboratory to re-extract and re-analyze any tissue sample for which all dioxin/furan or PCB congener results were undetected from the 20- or 10-gram extraction. LWG agreed to both of these requests and Axys has proceeded with the dioxin/furan and PCB congener analyses.

If you have any questions, please give me a call at (206) 241-5185.

Sincerely,

Betsy Striplin

RI/FS Coordinator

Copies: LWG Repository

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